



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 13 2002

REPLY TO THE ATTENTION OF

B-19J



Norman Stoner, P.E.
Division Administrator
Federal Highway Administration
3250 Executive Drive
Springfield, Illinois 62703

Re: Comments on the DEIS for U.S. Route 34, Between Carmen Road (East of Gulfport)
and Monmouth, Illinois - EIS No. 020094

Dear Mr. Stoner:

In accordance with the U.S. Environmental Protection Agency's (U.S. EPA's) responsibilities under both the National Environmental Policy Act and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS) for U.S. Route 34 from Carmen Road (east of Gulfport) to Monmouth, Illinois. Basically, the proposed project would widen U.S. Route 34 from two lanes to four lanes. The purpose of the proposed project is to provide an improved transportation facility for local and through traffic in Henderson and Warren Counties, Illinois. The stated needs for the project relate to: travel safety, system continuity, and system capacity.

We are pleased with the method used in the DEIS to evaluate alternatives. The DEIS evaluates project alternatives in roadway sections. For each section, the DEIS compares potential impacts and characteristics from each alternative. The impacts and characteristics fit under one of the following classifications: (1) Traffic and Transportation, (2) Socioeconomic/Land Use, (3) Natural Environment, and (4) Agriculture. The DEIS uses the comparisons to rationalize the elimination of alternatives. We believe that this alternative evaluation method is easy to understand. We have the following comments about the DEIS:

We are concerned about the level of information included in the DEIS with respect to water quality. The DEIS states that South Henderson Creek and Markham Creek are the only surface waters in the project corridor to be assessed for water quality by the Illinois Environmental Protection Agency. However, the DEIS gives a limited amount of water quality information for these two creeks. With such limited data, it is not possible to adequately assess the water quality of these rivers, nor is it possible to discern pollutant concentration trends for each river. Therefore, we recommend that the subsequent NEPA documentation include current and historical pollutant loading concentration data for South Henderson Creek and Markham Creek.

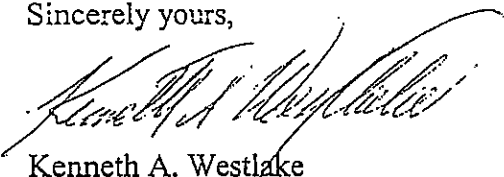
D-11

We are concerned with the potential of this project to impact impaired sections of waterbodies in the study area. The DEIS states that South Henderson Creek and Markham Creek are waterbodies in the study area listed as impaired streams under Section 303(d) of the Clean Water Act. The water quality impairment is due primarily to low dissolved oxygen levels, elevated nutrient levels, and siltation problems. Under Section 303(d), impaired streams are subject to the Total Maximum Daily Load (TMDL) program, which is used to return the streams to compliance with water quality standards. Under the TMDL program, all point and non-point sources that affect South Henderson Creek and Markham Creek are subject to maximum pollutant loadings that can be introduced into the river. The DEIS does not describe the effects of the feasible alternatives on the impaired status of South Henderson Creek and Markham Creek. We recommend that subsequent NEPA documentation include information on how the finalist alternatives would affect the impaired status of South Henderson Creek and Markham Creek.

We are concerned about project impacts to Botanical Site #3. According to the DEIS, construction of the preferred alternative will directly impact about 42 percent of this site. The DEIS states that Botanical Site #3 is a small sand hill prairie with a diverse mixture of grasses and forbs. Botanical Site #3 also provides potential habitat for the Western Hognose Snake, a state threatened species. The DEIS proposes to mitigate impacts to Botanical Site #3 by removing and stockpiling the topsoil within the project's cut area. After the desired grade is established, the topsoil would be replaced and re-seeded with an annual cover crop and a native prairie grass seed mixture. We recommend that subsequent NEPA documentation commit to this type of mitigation, and commit to other activities which would mitigate impacts to Botanical Site #3, such as constructing steep side slopes.

In summary, U.S. EPA has identified issues relating to characterization of existing water quality, impacts to impaired waters, and impacts to Botanical Site #3. Based upon our review of this project and its DEIS, we have assigned a rating of "EC-2" (environmental concerns, insufficient information). Please refer to the enclosed Summary of Rating Definitions Sheet. This rating will be published in the Federal Register. If you have any questions or comments, please feel free to contact Newton Ellens, of my staff, at (312) 353-5562.

Sincerely yours,



Kenneth A. Westlake
Chief, Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

Enclosure

cc: Joseph Crowe, P.E.
District Engineer
Illinois Department of Transportation

Steve Hamer
Transportation Review Program
Division of Natural Resources Review and Coordination
Illinois Department of Natural Resources

SUMMARY OF RATING DEFINITIONS AND FOLLOWUP ACTIONS*

ENVIRONMENTAL IMPACT OF THE ACTION

LO—Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1—Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment.



Illinois Department of Transportation

Division of Highways / District 4
401 Main Street / Peoria, Illinois / 61602-1111
Telephone 309/671-3333

July 24, 2002

BUREAU OF PROGRAM DEVELOPMENT
STUDIES & PLANS - PHASE I
FA ROUTE 313 (U. S. 34)
CARMAN ROAD TO MONMOUTH
HENDERSON & WARREN COUNTIES
JOB NO. P-94-030-95
CATALOG NO. 031314-00

Mr. Kenneth A. Westlake
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Mr. Westlake:

Thank you for your comments on the Draft Environmental Impact Statement for the US 34 project. A copy of your comments is enclosed. You expressed concern about the level of water quality information in the DEIS, potential impact to impaired stream and impacts to Botanical Area #3.

We believe there is sufficient information in the DEIS concerning water quality in the project area. The two streams which will be impacted by the project include South Henderson Creek and Markham Creek. Both streams were assessed using the IEPA Designated Use Methodology. In addition, physical characteristics (channel widths and depth, substrate), watershed characteristics (predominately agricultural) and biological attributes (fish, unionid mussels and macroinvertebrates) was provided for most of the streams in the project area. We include all of these factors as belonging to water quality. On this particular project we did not collect numeric (chemical) data because the IEPA Designated Use was based on year 2000 sampling.

The purpose of the water quality section is to describe the existing conditions, determine the potential for impact, and to suggest mitigate measure where necessary. The standard of review is to determine whether or not there is a 'significant impact' to any of the water resources in the project area. Pollutant loading concentration data is not required to make this determination.

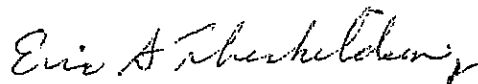
Concerning potential project impacts to impaired streams, TMDL's are to be prepared for those streams that are listed under Section 303(d) of the Clean Water Act. TMDL's are prepared by the Illinois EPA, not the Illinois DOT. When Illinois EPA informs the Illinois DOT that the Department is contributing to the impairment of a stream, the Department will comply with the Illinois EPA assessment and work to alleviate the Departments contribution. Currently, South Henderson Creek is given a rank of 288 out of 336. Markham Creek has a rank of 314 out of 336. Both of these streams do not have a high priority with the Illinois EPA and TMDL's most likely will not be proposed any time soon. Markham Creek is impaired because of municipal point source and the South Fork of Henderson Creek is impaired by agricultural and hydrological/habitat modifications. The Illinois DOT contribution to these streams impairment would be considered either nil or very minor. Because the two streams are fairly consistent throughout their reaches in their physical, chemical and biological parameters and based on the sources of the impairment(s), all alternatives would most likely be the same.

You suggested making the side slopes steeper in the vicinity of Botanical Site #3 as an additional mitigation measure. Due to the type of soils in this area providing steeper slopes is not possible. The subsequent NEPA document will include a commitment to relocate both the roots and seeds of the better species of plants, such as the wild blue larkspur and other prairie plants, to a suitable area prior to construction.

Please contact Paula Green of our office at 309-671-3478 if you have any questions concerning this matter.

Very truly yours,

Joseph E. Crowe, PE
District Engineer



By: Eric S. Therkildsen, PE
Program Development Engineer

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cc: T. Lacy
R. Dotson
P Green
Gary Baker, ESE, Chicago Office
Bill Elzinga, ESE, St. Louis Office



Illinois Historic
Preservation Agency

1 Old State Capitol Plaza • Springfield, Illinois 62701-1507 • (217) 782-4836 • TTY (217) 524-7128

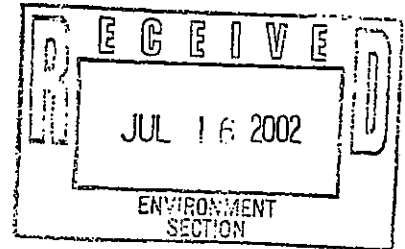
Various County

Henderson and Warren Counties

FA 313, US 24 - Realignment and Roadway Improvements
Carman Road to Monmouth
IDOT - P-94-030-95
IHPA LOG #0206100030WVA

June 27, 2002

Michael Hine
Illinois Department of Transportation
2300 S. Dirksen Parkway
Attn: John Walthall
Springfield, IL 62764



Dear Mr. Hine:

We have reviewed the documentation submitted for the referenced project(s) in accordance with 36 CFR Part 800.4. Based upon the information provided, no historic properties are affected. We, therefore, have no objection to the undertaking proceeding as planned.

Please retain this letter in your files as evidence of compliance with section 106 of the National Historic Preservation Act of 1966, as amended. This clearance remains in effect for one year from date of issuance. It does not pertain to any discovery during construction, nor is it a clearance for purposes of the Illinois Human Skeletal Remains Protection Act (20 ILCS 3440).

If you have any further questions, please contact Cody Wright, Cultural Resources Manager, Illinois Historic Preservation Agency, 1 Old State Capitol Plaza, Springfield, IL 62701, 217/785-3977.

Sincerely,

Anne E. Haaker

Anne E. Haaker
Deputy State Historic
Preservation Officer

AEH:CW:ly



Illinois Department of Agriculture

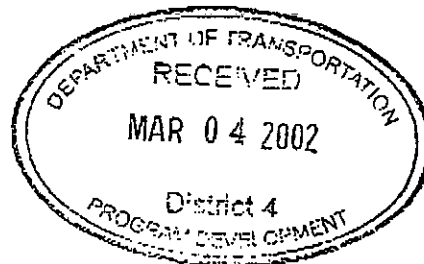
George H. Ryan, Governor • Joe Hampton, Director

Bureau of Land and Water Resources

State Fairgrounds • P.O. Box 19281 • Springfield, IL 62794-9281 • 217/782-6297 • TDD 217/524-6858 • Fax 217/557-0993

February 27, 2002

Mr. Joseph E. Crowe, P.E.
District Engineer
IDOT, Division of Highways/District 4
401 Main Street
Peoria, Illinois 61602-1111



Re: FA Route 313 (US 34)
Carman Road to US Route 67
Warren and Henderson Counties, IL
IDOT Job No P-94-030-95

Dear Mr. Crowe:

Enclosed is the USDA NRCS Form AD-1006 for the US 34 Improvement between Carman Road and US Route 67. One copy is to be included in the Draft Environmental Impact Statement; the other copy is for your files.

The Illinois Department of Agriculture will submit additional comments on the Draft Environmental Impact Statement, which is to be released in the near future.

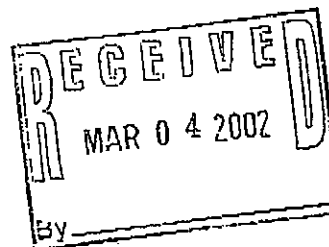
Sincerely,

Steve Frank, Chief
Bureau of Land and Water Resources

Enclosures

SF:TS

cc: Director Joe Hampton, IDA
Joan Messina, IDA
Mike Williams, IDA
Anita Kratochvil, IDA
John Herath, IDA
Warren Goetsch, IDA



U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request		11/9/01	
Name Of Project		Federal Agency Involved		Federal Highway Authority	
Proposed Land Use		County And State		Henderson & Warren Counties, IL	
PART II (To be completed by SCS)		Date Request Received By SCS		11-26-01	
Does the site contain prime, unique, statewide or local important farmland? (If no, the FPPA does not apply -- do not complete additional parts of this form).		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Acres Irrigated	Average Farm Size
				—	372
Major Crop(s)	Farmable Land In Govt. Jurisdiction	Amount Of Farmland As Defined In FPPA			
Corn, Soybeans, Wheat, Hay	Acres: 29,633,500 % 97	Acres: 27,695,900 % 91			
Name Of Land Evaluation System Used	Name Of Local Site Assessment System	Date Land Evaluation Returned By SCS			
Illinois	Statewide	12-4-01			
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly		677			
B. Total Acres To Be Converted Indirectly		0			
C. Total Acres In Site		677			
PART IV (To be completed by SCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland		471			
B. Total Acres Statewide And Local Important Farmland		58			
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted		0.002			
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value		25.9			
PART V (To be completed by SCS) Land Evaluation Criterion * 1.5		110			
Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)		73			
PART VI (To be completed by Federal Agency)		Maximum Points			
Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))					
1. Area In Nonurban Use					
2. Perimeter In Nonurban Use					
3. Percent Of Site Being Farmed					
4. Protection Provided By State And Local Government					
5. Distance From Urban Builtup Area					
6. Distance To Urban Support Services					
7. Size Of Present Farm Unit Compared To Average					
8. Creation Of Nonfarmable Farmland					
9. Availability Of Farm Support Services					
10. On-Farm Investments					
11. Effects Of Conversion On Farm Support Services					
12. Compatibility With Existing Agricultural Use					
TOTAL SITE ASSESSMENT POINTS * 150		150	114		
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		* 150	100	110	
Total Site Assessment (From Part VI above or a local site assessment)		* 150	150	114	
TOTAL POINTS (Total of above 2 lines)		* 300	260	224	
Site Selected:		Date Of Selection		Was A Local Site Assessment Used?	
				Corridor - State <input checked="" type="checkbox"/>	
Reason For Selection:					

* When utilizing the state Site Assessment Corridor Factors, 150 points are assigned to the Land Evaluation (LE) portion, and 150 points are assigned to the Site Assessment (SA) portion, for a maximum of 300 points.

**US Route 34 (FA Route 313)
Carmen Road to US Route 67
Henderson and Warren Counties, Illinois
Federal Highway Administration Funds**

PART VI-B Illinois Site Assessment <i>CORRIDOR</i> Factors	Maximum Points	Site A
1. Amount of Agricultural Land Required	30	29
2. Location of the Proposed Alignment	30	16
3. Acres of Off-Site Agricultural Land Required for Borrow Materials	15	15
4. Acres of Prime and Important Farmland Required for Mitigation	15	0
5. Creation of Severed Farm Parcels	10	10
6. Creation of Uneconomical Remnants	10	10
7. Creation of Landlocked Parcels	10	10
8. Creation of Adverse Travel	10	10
9. Relocations of Rural Residences and Farm Buildings	10	10
10. Utilization of Minimum Design Standards	10	4
TOTAL SITE ASSESSMENT <i>CORRIDOR</i> POINTS	150	114

PART VII

Relative Value of Farmland	150	110
Total Site Assessment <i>CORRIDOR</i> Factors	150	114
TOTAL ILLINOIS LESA POINTS	300	224

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Illinois Department of Agriculture

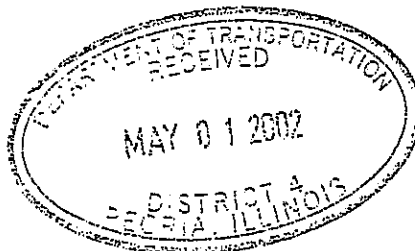
George H. Ryan, Governor • Joe Hampton, Director

Division of Natural Resources

State Fairgrounds • P.O. Box 19281 • Springfield, IL 62794-9281 • 217/785-4233 • Voice/TDD 217/785-2427 • Fax 217/524-4882

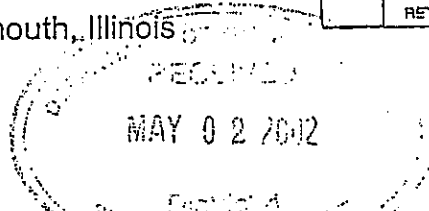
April 30, 2002

Mr. Joseph E. Crowe
Illinois Department of Transportation
Division of Highways / District 4
401 Main Street
Peoria, Illinois 61602-1111



POST WORK	
FILE	
ADMIN.	
IMPLEMENTATION	
CC. ROS.	
OPERATIONS	
PROGRAM DEVELOPMENT	<input checked="" type="checkbox"/>
REPLY	
PREPARE REPLY FOR D.E. RSN	
INVESTIGATE & REPORT	
RETURN	

Re: U.S. Route 34 (FAP 313)
Carman Road (east of Gulfport) to Monmouth, Illinois
Henderson & Warren Counties
Draft Environmental Impact Statement



Dear Mr. Crowe:

Thank you for sending the Illinois Department of Agriculture (IDA)-the revised Draft Environmental Impact Statement (DEIS) on the improvement of U.S. 34 in Henderson and Warren Counties from a two lane to a four lane facility. The IDA has reviewed the DEIS and offers the following comments.

On September 26, 2001, the IDA submitted numerous comments to the District on the preliminary DEIS. The District incorporated most of the changes the IDA suggested. The final DEIS seems to present a very thorough and accurate assessment of the project's agricultural impacts. The District is to be commended for its willingness to revise the DEIS in such a manner.

After reviewing the final DEIS, the IDA has concluded that the District has made a significant effort to minimize the project's agricultural impacts. However, there remains one area in which the District could further reduce the project's agricultural impacts. According to the DEIS, the project will generate 23 uneconomical remnants (totaling 45.9 acres) and two landlocked parcels (totaling 25.5 acres). The District plans to use these remnants and parcels for tree replacement purposes and to make them available, pending soil suitability, for borrow sites.

The IDA would endorse the use of the uneconomical remnants and landlocked parcels as sources of borrow materials to keep additional Prime farmland from being acquired for this purpose. If the remnants and parcels cannot be used for this purpose, the IDA would ask that they be made available for purchase by adjacent landowners. If they all could be kept in agricultural production, the project's Prime and Important farmland conversion impacts could be decreased by 13.4% (529 acres to 458 acres). This is a very significant reduction in the project's farmland conversion impacts.

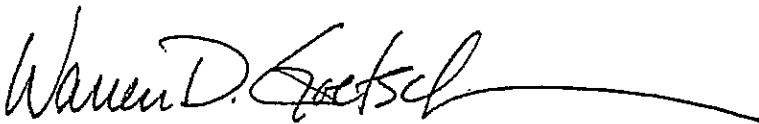
Mr. Crowe
Page 2
April 30, 2002

From the maps that accompanied the DEIS (Appendix C), it looks as though most of the remnants and parcels are adjacent to other land that is now farmed and could easily be incorporated into other farming operations. Since only 20 acres of wooded land will be impacted by the project, it does not appear that every remnant and parcel is needed for tree replacement. In addition, since the IDOT owns a 1,625 wetland mitigation area in Brown County and a 945 acres in Grundy County (of which, over 500 acres are farmed), it would seem that IDOT possess ample opportunity for replacing trees on land the IDOT already owns. As an alternative, the District may also pursue replacing the trees on land that is already publicly owned.

The IDA realizes that it may be contrary to IDOT policy to offer land for sale in the manner described above; however, we feel the IDOT should pursue every avenue practical and feasible to minimize farmland conversion impacts on its highway improvement projects. Doing so would be consistent with the IDOT's Agricultural Land Preservation Policy which states, *"Recognizing that its transportation objectives must be in concert with the overall goals of the State, it is the policy of the DOT, in its programs, procedures, and operations, to preserve Illinois farmland to the extent practicable and feasible, giving appropriate consideration to the State's social, economic, and environmental goals."*

Please consider the IDA's request that the IDOT keep as many of the uneconomical remnants and landlocked parcels in agricultural production as a means of further reducing this project's agricultural impacts. Should you wish to discuss our proposal further, please contact Jim Hartwig of my staff at 217-785-4470. Upon receiving your response to this letter, the IDA will be in a position to determine the project's compliance with the IDOT's Agricultural Land Preservation Policy and with the intent of the state's Farmland Preservation Act (505 ILCS 75/1 et. seq.).

Sincerely,



Warren D. Goetsch, P.E.
Administrator, Division of Natural Resources

SF:JH

cc: Kevin Rund, Illinois Farm Bureau
Shannon Pence, Henderson County SWCD
Rick Winbigler, Warren County SWCD



Illinois Department of Transportation

Division of Highways / District 4
401 Main Street / Peoria, Illinois / 61602-1111
Telephone 309/671-3333

July 24, 2002

BUREAU OF PROGRAM DEVELOPMENT
STUDIES & PLANS - PHASE I
FA ROUTE 313 (U. S. 34)
CARMAN ROAD TO MONMOUTH
HENDERSON & WARREN COUNTIES
JOB NO. P-94-030-95
CATALOG NO. 031314-00

Mr. Warren D. Goetsch, Administrator
Illinois Department of Agriculture
Division of Natural Resources
P.O. Box 19281
Springfield, IL 62794-9281

Dear Mr. Goetsch:

Thank you for your comments on the Draft Environmental Impact Statement for the US 34 project. A copy of your comments is enclosed. Your letter inquired about the possibility of making uneconomical remnants and landlocked parcels available for purchase by adjacent landowners.

In regard to small remnants the owner may retain the property, sell the property to an adjacent landowner or request that IDOT purchase the property. The final disposition of each of these remnants will not be known until Land Acquisition begins negotiations with the owner. It is not anticipated that all the uneconomical remnants would be purchased.

If a landlocked parcel or an uneconomical remnant is not needed for borrow or mitigation measures it could be sold. In order for the State to sell these types of parcels a prospective buyer must first make a request to purchase the property. Then the property could be sold by the State at a public auction.

Please contact Paula Green of our office at 309-671-3478 if you have any questions concerning this matter.

Very truly yours,

Joseph E. Crowe, P.E.
District Engineer

A handwritten signature in cursive script, reading "Eric S. Therkildsen".

By: Eric S. Therkildsen, P.E.
Program Development

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cc: T. Lacy
R. Dotson
P Green

Gary Baker, ESE, Chicago Office
Bill Elzinga, ESE, St. Louis Office